

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

JOSHUA BACON,  Plaintiff, <i>pro se</i> ,  v.  LUZERNE COUNTY, et al.,  Defendants,	           	NO. 3:23-CV-01699-RDM-CA  [JUDGE MARIANI]      Filed via U.S. Mail on July 24, 2024
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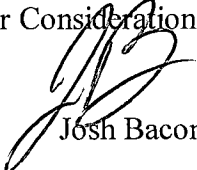
**MOTION FOR EXTENSION OF TIME TO ANSWER DEFENDANTS' DISCOVERY**  
**REQUESTS (INTERROGATORIES AND PRODUCTION OF DOCUMENTS)**

AND NOW, comes the Plaintiff, JOSHUA DWANE BACON, acting *pro se*, respectfully representing the following facts in response to the Defendants' Motion.

1. Plaintiff did receive the Defendants' Discovery Requests (Interrogatories #1 and Production of Documents #1) on approximately July 15, 2024.
2. Plaintiff has spent significant time compiling the information requested in these requests and intends to comply with them, with the exception of questions to which he objects.
3. Plaintiff is in need of additional time to respond to some aspects of the request, including healthcare provider HIPAA disclosures, as he has been seen by many different providers over the course of his life and does not personally have the information for these providers. Plaintiff's parents are in the process of recovering this information from insurance providers, but more time is required.
4. Additionally, as part of the discovery request, Plaintiff has chosen to include a notarized, sworn personal affidavit specifically discussing the mental anguish he suffered as a result of the Defendants' conduct during the events in question. More time is required to write this.
5. Plaintiff calculates his approximate deadline as August 10, 2024. This is unfortunate timing, as it lines up with his final week of his college semester with Eastern University (final submissions are due August 16, 2024).
6. WHEREFORE, Plaintiff requests an additional thirty (30) days to respond to this

Discovery Request, with a new deadline date of approximately September 9, 2024. This is with the understanding that Plaintiff will submit as much information as he can before the original deadline, and will inform the Defendants' counsel as to which numbered items he requires additional time on.

Respectfully Submitted For Your Consideration,



Josh Bacon

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**FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

JOSHUA DWANE BACON,  
Plaintiff, *pro se*,

v.

LUZERNE COUNTY, et al.,  
Defendants,

| NO. 3:23-CV-01699-RDM-CA

| [JUDGE MARIANI]

| Filed via U.S. Mail on July 24, 2024

**CERTIFICATE OF SERVICE**

I, JOSHUA DWANE BACON, hereby certify that on Wednesday, July 24, 2024, I served a copy of the foregoing **MOTION FOR EXTENSION OF TIME TO ANSWER DEFENDANTS' DISCOVERY REQUESTS (INTERROGATORIES AND PRODUCTION OF DOCUMENTS)** upon the persons indicated below via United States Mail:

United States District Court for the Middle District of Pennsylvania  
235 N. Washington Ave  
PO Box 1148  
Scranton, PA 18501

Dougherty, Levanthal, & Price, LLP  
ATTN Sean P. McDonough, Esq.  
75 Glenmaura National Boulevard  
Moosic, PA 18507

Respectfully Submitted For Your Consideration,

  
Josh Bacon

Smart Communications/PADOC

SCI- *CHS*

Name *Bacon*

Number *QNG571*

PO Box 33028

St Petersburg FL 33733

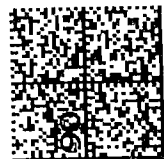
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United States District Court  
Middle District of PA  
235 N Washington Ave  
PO Box 1148  
Scranton, PA 18501-1148

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